

Rick Hernandez
HERNANDEZ LAW OFFICES, LLC
440 So. 6th St. P.O. Box 1039
Sunnyside, WA. 98944
(509) 837-3184

Attorney for Reymundo Garcia

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)
) NO. 4:20-CR-06002-SAB-5
Plaintiff,)
) MOTION TO EXPEDITE
vs.)
) HEARING: 11/15/21 @6:30PM
REYMUNDO GARCIA,) WITHOUT ORAL ARGUMENT
Defendant.)

Ricardo Hernandez, attorney for REYMUNDO GARCIA, moves the Court for an Extension of time to File Objections to Pre-Sentence Investigation Report and Sentencing Memorandum.

This motion is based on upon the records and file herein, and Local Rule 7.1 (h) (6).

MOTION

Defense counsel requests the Court to consider his separately filed Motion for an Extension of time to File Objections to Pre-Sentence Investigation Report and Sentencing Memorandum outside the normal timeline set forth in Local Rule 7.1. Such expedited consideration is allowed by Local Rule 7.1 (h) (6), which provides that:

MOTION TO EXPEDITE

- 1 -

RICARDO HERNANDEZ
HERNANDEZ LAW OFFICE, LLC
440 S. 6th STREET
P.O. BOX 1039
SUNNYSIDE, WA 98944
(509) 837-3184

1 The Court on its own motion or the written request of any party, may
2 waive the time requirements of this rule and grant an immediate hearing
3 on any emergency matter. The request shall set forth in detail the
4 reasons for an expedited hearing.

5
6 Mr. Hernandez hereby incorporates by reference the representations made in
7 counsel's declaration in support of his motion for an Extension of time to File
8 Objections to Pre-Sentence Investigation Report and Sentencing Memorandum.

9 Dated this 12th day of November, 2021
10

11 Respectfully Submitted,
12

13 s/ Ricardo Hernandez
14 Ricardo Hernandez #21463
15 Attorney for Reymundo Garcia
16
17
18

19 **CERTIFICATION OF SERVICE**

20 I hereby certify that on November 12, 2021 I electronically filed the foregoing
21 with the Clerk of the Court using the CM/ECF System which will send
22 notification of such filing to the following: Stephanie Van Marter, Assistant
23 United States Attorney
24

25 s/ Ricardo Hernandez
26 Ricardo Hernandez #21463
27 Attorney for Reymundo Garcia
28